

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF J.K.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, J.K., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am professor at a college, where I teach studio art. My husband is a software
5 engineer. We have two children. Our 14-year-old is transgender and uses they/them pronouns.
6 In this declaration, I'll refer to them as "Minor A". We also have an 18-year-old son, who is
7 queer. In addition to my family members, I teach many trans students at the college where I
8 work. I used to teach art at an elementary school, and I have many former students who are trans.
9 I wanted to make this declaration for all the amazing trans and queer young people in our life.
10 Our house is a safe space for our kids and their friends, so we get to hear how the young people
11 around us are absorbing the news of the recent Executive Orders (E.O.s) affecting trans people
12 and all the fear they are causing. So many of my current and former students have reached out
13 to me to talk because they are worried for their safety and unsure about the future.

14 3. I have chosen to submit this declaration using only my initials and to refer to my
15 14-year-old as "Minor A" because I don't want to put myself or my children in harm's way.
16 Additionally, it is not an option for me to bring my own lawsuit on this issue because it would
17 be cost prohibitive and would risk my children's safety.

18 4. Our 14-year-old, Minor A, is the sweetest, funniest kid you will ever meet. They
19 love cooking and hanging out with their friends. When they were about four or five years old,
20 they started asking me, "how do you know if you're a boy or a girl?" Ever since they were little,
21 they have loved typical "girl things" like wearing pink and sparkly clothes and playing with My
22 Little Pony, baby dolls, and playing house. We always supported them in wearing whatever they
23 wanted to wear and liking the toys they liked.

24 5. When they were in kindergarten, they suddenly stopped wearing "girl clothes" to
25 school. We learned that some of Minor A's classmates had made fun of them for wearing clothes
26

1 that girls typically wear. For a period of time, they switched to wearing “boys’ clothes” at school,
2 but when they were at home, they always wanted to wear sparkly things.

3 6. Around fifth grade, Minor A began asking us to use different pronouns. They said
4 they felt like both “she/her” and “they/them” pronouns fit. Around sixth grade, they asked us to
5 use a different name for them. By seventh grade, they had settled into their current gender
6 identity, which has remained consistent ever since—they chose a new name that they love, and
7 they asked us to use “they/them” pronouns. To support them in their transition, we enrolled them
8 in summer camps and anti-bullying school programs that sent affirming messages. Their teachers
9 have also been amazing at supporting their transition at school.

10 7. When Minor A was around 12 years old, they asked if we could go to a Gender
11 Clinic to learn more about puberty blockers and hormones. We had two separate, very thorough,
12 meetings with an endocrinologist at the Gender Clinic. During these meetings, the doctors and
13 nurses asked Minor A so many questions about their wishes and expectations for their body.
14 They explained that soon, Minor A would start to go through puberty, and this would involve
15 getting taller, growing broader shoulders, growing an Adam’s apple, and their penis getting
16 bigger. They discussed the side effects of puberty blockers with us. They also explained that
17 non-treatment (meaning, not taking any hormones or puberty blockers) is an option that many
18 kids choose. As a family, we gathered so much information about gender-affirming care during
19 these visits. At the time, Minor A decided they weren’t quite ready to start puberty blockers. So,
20 we chose the non-treatment option. That felt right for Minor A and our family at the time.

21 8. Over a year later, Minor A told us they were ready to talk to their doctor again
22 about puberty blockers and estrogen. We discussed their decision, as a family, at the dinner table.
23 They were sure this was what they wanted. We obtained a letter from a therapist who
24 recommended gender-affirming care. I then spoke with a nurse two or three times before we had
25 our first appointment with the endocrinologist. They wanted to make sure Minor A was
26 consistent, insistent, and persistent in their decision to pursue puberty blockers and estrogen

1 therapy. As we got closer to the doctor's appointment where we would discuss puberty blockers,
2 Minor A got more and more excited. It was clear to me and my husband this was what they
3 wanted.

4 9. In November 2024, we had a consultation with the endocrinologist to talk about
5 puberty blockers for Minor A. Minor A, my husband and I all attended the doctor's appointment.
6 In December 2024, we had a consultation with the endocrinologist to discuss estrogen. After that
7 appointment, Minor A's doctor started them on both puberty blockers and estrogen therapy. They
8 have had follow up appointments every three months since then.

9 10. Minor A has seen a gender-affirming therapist for about two years. Before they
10 started seeing their therapist, they experienced symptoms of gender dysphoria for several years,
11 including anxiety and depression around not presenting in the way they wanted to. Through
12 therapy, Minor A has been making progress working through their dysphoria.

13 11. Minor A has been taking puberty blockers and estrogen for a few months now,
14 and I have seen their gender dysphoria transform into trans joy. Their anxiety and depression
15 have lessened dramatically. They are excited to witness and document each small detail of their
16 changing body. Their friends are being so affirming and their school is supporting them as well.
17 I feel like I got my happy, well-adjusted kid back.

18 12. I am aware of the E.O. putting conditions on gender-affirming care for youth. As
19 a family, we have had conversations regarding the existing and anticipated harms of the EO, but
20 I also want to try to shield my kids and not engage in fear mongering. Minor A is a smart kid
21 who is aware of the world around them. The onslaught of anti-trans E.O.s have increased their
22 anxiety in the last few weeks. They know that this E.O. could affect their access to hormones
23 and puberty blockers, among other forms of gender-affirming care. They are transitioning to
24 high school soon, and they are worried about starting a new school without access to the
25 healthcare they need. They are worried they won't be able to use their bathroom of choice at
26 their new school. There are so many scary unknowns for Minor A and for our family right now.

1 13. Since the President issued the E.O. limiting gender-affirming care, my husband
2 and I have talked about what it looks like if we decide we need to move to another country to
3 ensure Minor A has access to gender-affirming care. We are trying to plan ahead for possible
4 supply issues, and we recently requested from Minor A's doctor a prescription for a year's supply
5 of estrogen and an alternative puberty blocker, for which we have to pay out of pocket. This is a
6 financial burden for us, but we are willing to take it to ensure Minor A can continue with their
7 medical care. We updated Minor A's birth certificate, but we haven't been able to update their
8 social security card and passport yet. This brings my husband and me a lot of anxiety and we
9 worry about traveling as a family, potentially being detained at the border, and being separated
10 from Minor A.

11 14. If Minor A lost access to gender-affirming care, everything in their life would
12 become substantially darker. I worry that we would see a return not only of their earlier feelings
13 of depression and withdrawal, but also that they would lose their joy. I also worry that without
14 the puberty blockers and estrogen they take, they could experience suicidal ideation.

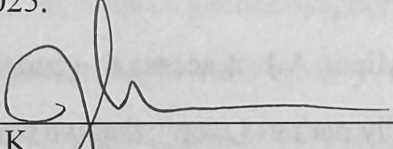
15 15. As a college professor, I have taught and become familiar with many trans
16 students. I pride myself on being a safe person to whom my trans students feel comfortable
17 confiding. One trans student, for example, approached me before class last week and explained
18 to me that recent events were becoming too big and scary for them. During this conversation, I
19 talked to them about using joy as a form of resistance and encouraged them to seek out "little
20 things" to make this complicated climate worthwhile. Since then, I've been checking in with this
21 student regularly. The distress I'm seeing many of my students experience puts added pressure
22 on me as a mentor and safe adult. It is very clear to me that trans and queer young adults are
23 struggling with fear, anxiety, and helplessness right now as a direct result of this and other E.O.s
24 that target transgender people.

25 16. I know that this lawsuit concerns the E.O. limiting gender-affirming care, but the
26 other E.O.s that target trans people also negatively affect our family. For example, the E.O.

1 concerning "gender ideology" that says the Federal Government will only "recognize two sexes,
2 male and female" further marginalizes Minor A because they are nonbinary. This same E.O.
3 requires government identification documents like passports to "accurately reflect the holder's
4 sex" and does away with any gender marker "X". We worry that this E.O. effectively travel bans
5 our family and we are terrified to travel with Minor A. And the E.O. that restricts trans people
6 from serving in the military affects my child's ability to one day join the military if they so
7 choose.

8 I declare under penalty of perjury under the laws of the State of Washington and the
9 United States of America that the foregoing is true and correct.

10 DATED this 17th day of February 2025.

11 
12 J.K.
13 Parent of "Minor A"